



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

---

*86 Chambers Street  
New York, New York 10007*

January 7, 2025

BY ECF

The Honorable Andrew L. Carter, Jr.  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 2203  
New York, NY 10007

Re: *Knight First Amendment Institute v. U.S. Dep't of Homeland Security et al.*,  
No. 17 Civ. 7572 (ALC)

Dear Judge Carter:

I represent Defendants (the "government") in the above-referenced FOIA action and write respectfully on behalf of all parties in the above-referenced FOIA action to provide a status update.

Since the last status report, Plaintiff has reviewed all of the draft Vaughn indexes provided by the government and determined that it will not raise any additional challenges to the government's asserted FOIA exemptions. Therefore, the only remaining issue is attorneys' fees and costs. Plaintiff is now preparing a demand and supporting documentation for the government's consideration. To allow the parties to discuss a potential resolution of this issue without the Court's intervention, the parties respectfully propose to file a further status update by March 10, 2025.

I thank the Court for its attention to this matter.

Respectfully,

EDWARD Y. KIM  
Acting United States Attorney

By: /s/ Peter Aronoff  
PETER ARONOFF  
Assistant United States Attorney  
86 Chambers Street, 3rd Floor  
New York, NY 10007  
Tel: (212) 637-2697  
Email: peter.aronoff@usdoj.gov

cc: Counsel for Plaintiff (by ECF)